



State of Ohio Environmental Protection Agency

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Bob Taft, Governor
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April 2, 2002

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

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RE: APPROVAL OF PSP FOR THREE NEW INJECTION WELLS

Dear Mr. Reising:

The Ohio Environmental Protection Agency committed to fast-tracking our review of the Project Specific Plan for the Installation of Three New Re-Injection Wells along Willey Road. We initiated several telephone calls to resolve questions and comments that otherwise would have required written comments and written responses.

- We had concerns about the lack of provisions for storm water controls during construction and the lack of details on the construction of the roads needed to access the new wells. We initially thought that geogrid should be used to construct the roads, especially the road to Well 8a, which is located on the slope of a hill that drains to Paddys Run. Our belief was that geogrids would allow vegetation to grow on the road and also save the effort needed to remove the gravel when the road is no longer needed. It was explained that storm water controls would be provided during construction of the wells and roads. Two factors negate our recommendation for a geogrid road. First, heavy traffic use would probably inhibit the growth of vegetation through the geogrid were it used. Second, the relatively unstable soils in this area would require that aggregate be used in the base of the geogrid road. We agreed that a gravel road was satisfactory as long as standard erosion control measures are taken.
- We noted that Driscoll (Driscoll, F.G., 1986. Groundwater and Wells, Johnson Division, St. Paul, Minnesota) cautions that great care should be taken to avoid introducing iron bacteria into a well during drilling. We commented that all drilling tools and all well construction materials (screens, casings, gravel pack, etc.) should

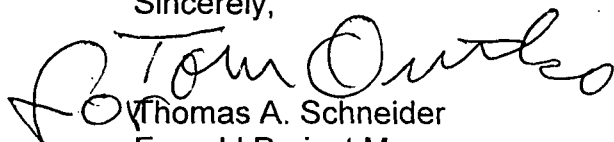
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be disinfected prior to use and that sufficient free chlorine should be maintained in the drilling fluids. In response, it was asserted that iron bacteria are wide spread in the GMA and that there was little potential for introducing additional bacteria. Furthermore, the PSP commits to super chlorinating the well after construction. We concurred that disinfecting the tools and materials should not be performed.

The Ohio EPA approves this PSP.

Should you have any questions, please contact Tom Ontko or me.

Sincerely,



Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, Fluor Fernald
Mark Shupe, GeoTrans, Inc.
Francie Hodge, Tetra Tech EM Inc.
Ruth Vandergrift, ODH